

RESUBMITTAL LETTER FOR CHATTANOOGA (Updated)

March 29, 2004

Barry Stephens, Director
Tennessee Air Pollution Control Division
401 Church Street
L&C Annex 9th Floor
Nashville, Tennessee 37243-0435

Dear Mr. Stephens:

This is our submission of the local plan to achieve and maintain the 8-hour ozone standard within the Hamilton-County portion of the Chattanooga, Tennessee - North Georgia MSA Early Action Compact Area and describes the local measures that will be adopted in Hamilton County, Tennessee, by March 31, 2004. The modeling analysis will be submitted to the State and the United States Environmental Agency by our modeling contractor.

The local control measures being implemented in Hamilton County and Chattanooga are the following:

1. **Stage 1 Vapor recovery.** Hamilton County has amended the Hamilton County Air Pollution Control Regulations to adopt Stage 1 Vapor Recovery. The resolution was approved on March 16, 2004, and will be implemented by March 1, 2005.

The City of Chattanooga has amended the Chattanooga Air Pollution Control Ordinance to adopt Stage 1 Vapor Recovery. The resolution was approved on first reading on March 23, 2004. Second and third readings are scheduled for March 30, 2004, with implementation by March 1, 2005. Implementation of Stage 1 Vapor Recovery is required by March 1, 2005.

Copies of the resolution from the Hamilton County Commission and the Ordinance which passed on first reading by the Chattanooga City Council are attached.

2. **Open Burning Restrictions.** Under the existing air pollution control regulations, open burning is restricted to "days of low pollution potential." As specified in the attached resolutions of the Hamilton County Commission and the Chattanooga City Council, open burning will be restricted on Ozone Action Days effective May 15, 2004.
3. **Ozone Action Days Program.** The program is being instituted using existing local authority. Planning has been completed. The program will be initiated by May 15, 2004. Early start-up of this program is being implemented to allow additional time to develop public awareness and to develop community support in order to maximize the benefits from the program by March 1, 2005. The attached resolutions of the Hamilton County Commission and the Chattanooga City Council show the commitment of local government to support this program.
4. **Bike Trails and Bike Racks at Worksites.** The program was adopted by the Metro Planning Organization as the Chattanooga Urban Area Bicycle Facilities Master Plan in June of 2002. Bike racks are in place, bike lanes are marked and bike racks are installed on Chattanooga Area Regional Transit Agency buses. Bicycle use appears to be growing based on tracking. The League of American Bicyclists has designated Chattanooga as a bicycle friendly community (Bronze Award) in October 2003. This program was not included in the modeling analysis.
5. **Cetane to Diesel.** This program encourages the use of cetane additives.
6. **Anti-Idling Program.** Existing air pollution control regulations limit idling of diesel engines to five consecutive minutes. This program will educate drivers of the advantages and requirements of minimizing idling and increase enforcement efforts.
7. **Increased Bus Ridership.** Chattanooga Area Regional Transit Authority has been on a campaign to increase ridership since 1998. From fiscal year 1998 to fiscal year 2000 ridership has increased from 2,994,087 to 3,226,009. Through our Ozone Action Days program, we will further promote mass transit use.

In addition to the measures that have been adopted by the governing bodies, the resolutions of the Hamilton County Commission and the Chattanooga City Council support the following state efforts.

1. Statewide Stage 1 Vapor Recovery
2. Statewide Anti-Idling rules
3. Statewide Vehicle tampering rules
4. State wide NO_x RACT rules

The attainment demonstration and the modeling analysis have been completed under contract by Systems Applications International, Inc. This document is being submitted to the State and to EPA by Systems Applications International, Inc., in fulfillment of our commitments under the Early Action Compact.

Very truly yours,

Robert H. Colby
Director

cc: Kay Prince, U.S. EPA - Region IV
CERTIFIED MAIL 7002 3150 0004 3231 6498
Return Receipt Requested